

Regarding claim 1, it is asserted that all of the limitations of claim 1 are taught in the Abstract of Nguyen. Applicant notes that, as presently amended, claim 1 recites that the input start time is provided to establish a context in responding to the input speech signals. Note that the amendments to claim 1 do not add new matter to the application. Applicant notes that the Abstract of Nguyen is completely silent with regard to using an input start time of an input speech signal (relative to an output audio signal) to establish a context in responding to the input speech signal. Indeed, the entire disclosure of Nguyen--being essentially directed to a technique for determining the start of a speech signal in an input signal that includes the speech signal as well as the residue of an output prompt--is silent with respect to *any* technique for determining a context in responding to the input speech signal. As such, Nguyen fails to anticipate each and every limitation of claim 1, which claim is therefore in suitable condition for allowance.

Regarding claims 2 and 3, Applicant notes that these claims are dependent upon, and therefore incorporate the limitations of, claim 1 and recite additional patentable subject matter. Because Nguyen fails to anticipate claim 1, Applicant respectfully submits that claims 2 and 3 are also allowable over Nguyen to the extent that claims 2 and 3 are dependent upon, while further limiting to, claim 1.

Regarding claim 4, the shortcomings of Nguyen in anticipating claim 1 described above equally apply to claim 4 to the extent that claim 4 has also been amended to recite that the identification of the outbound audio signal is provided to establish context in responding to the inbound speech signal. Of equal significance is the complete failure of Nguyen to teach anything even analogous or similar to the recitation in claim 4 of "determining an identification corresponding to the output audio signal." The rejection of claim 4 fails to note this distinction in erroneously stating that "[c]laims 4-5 are method claims similar in scope and content of method claims 1-3", presumably justifying the rejection of claim 4 "under similar rationale" as that used in rejecting claim 1. Under any reasonable interpretation, the determination of an identification of an outbound signal is clearly different, and not similar in scope in content, from determining an input start time of an input speech signal, thereby rendering Examiner's assumption that claim 4 is "similar in scope and content" to claim 1 false, and consequently rendering the rationale for rejecting claim 4 equally unpersuasive. With reference to M.P.E.P. § 707.07(f) (stating that "[w]here the applicant traverses any rejection, the examiner should, if he

or she repeats the rejection, take note of the applicant's argument and answer the substance of it.”), Applicant also notes that Nguyen's failure to teach the claimed recitation of “determining an identification corresponding to the output audio signal” was previously raised in Applicant's response dated May 6, 2002. Notwithstanding this, and contrary to M.P.E.P. § 707.07(f), the instant Final Office Action is devoid of any response to this argument, save for the exact same basis for rejecting claim 4 as previously provided in the Office Action mailed February 6, 2002. As such, Applicant respectfully requests that claim 4 be held allowable for the reasons stated above, or the finality of the rejection be withdrawn such that the applicants' arguments may be more fully answered.

Regarding claims 6, 13, 18, 25, 31, 38, 43 and 50, Applicant notes that these claims are generally directed to a method or apparatus for either a subscriber unit or speech recognition server, wherein the subscriber unit is in wireless communication with an infrastructure comprising the speech recognition server. Nguyen is completely silent regarding anything remotely like a subscriber unit or infrastructure-based speech recognition server in wireless communication with each other. This distinction is further reflected in numerous limitations found in claims 6, 13, 18, 25, 31, 38, 43 and 50. Regarding claims 6 and 31, Nguyen fails to teach the subscriber unit providing (or means for providing) the input start time of the input speech signal to the speech recognition server as a control parameter. Regarding claims 13 and 38, Nguyen fails to teach the subscriber unit determining (or means for determining) an identification corresponding to the output audio signal, or providing (or means for providing) the identification to the speech recognition server as a control parameter. Regarding claims 18 and 43, Nguyen fails to teach the speech recognition server providing (or means for providing) information signals to the subscriber unit in response to the input start time received from the subscriber unit. Regarding claims 25 and 50, Nguyen fails to teach the speech recognition server providing (or means for providing) information signals to the subscriber unit in response to an identification, received from the subscriber unit, corresponding to the output audio signal. Because Nguyen fails to teach these claimed limitations, Applicant respectfully submits that claims 6, 13, 18, 25, 31, 38, 43 and 50 are in suitable condition for allowance.

Regarding claims 7-12, 14-17, 19-24, 26-30, 32-37, 39-42, 44-49 and 51-55, Applicant notes that these claims are dependent upon, and therefore incorporate the limitations of, claims 6,

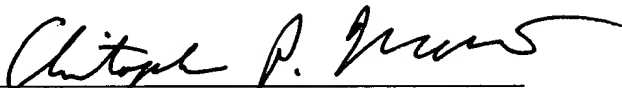
13, 18, 25, 31, 38, 43 and 50, respectively, and recite additional patentable subject matter. Because Nguyen fails to anticipate claims 6, 13, 18, 25, 31, 38, 43 and 50, Applicant respectfully submits that claims 7-12, 14-17, 19-24, 26-30, 32-37, 39-42, 44-49 and 51-55 are also allowable over Nguyen to the extent that claims 7-12, 14-17, 19-24, 26-30, 32-37, 39-42, 44-49 and 51-55 are dependent upon, while further limiting to, claims 6, 13, 18, 25, 31, 38, 43 and 50, respectively.

Finally, Applicant notes Examiner's assertion that Nguyen teaches determining an input start time of the input speech signal relative to the output audio signal with reference to Nguyen's teachings of echo cancellation found at column 1, lines 54-67. Applicant respectfully disagrees with Examiner's contention that a teaching of the well known technique of echo cancellation reads on the claimed determination of an input start time relative to an output audio signal. None of the teachings found at column 1, lines 54-67 make reference to determining an input start time of an input speech signal relative to an output audio signal. In fact, as the cited portion of Nguyen makes clear, echo cancellation is generally concerned with determining when an echoed version of the outbound prompt is present in an inbound signal, not when an inbound speech signal starts. At most, Nguyen teaches a technique that may be used to carry out the claimed detection of a *start* of an input speech signal (as opposed to the *input start time* of the input speech signal) as found, for example, in the first clause of the body of claim 1. In light of this, Applicant renews his arguments, set forth in his response dated May 6, 2002, regarding Nguyen's failure to teach the determination of an input start time of an input speech signal relative to an output audio signal.

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is captioned "Version with markings to show changes made".

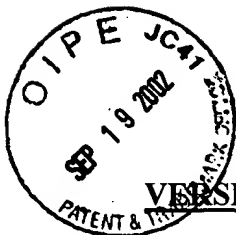
Applicants respectfully request that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed agent if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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Date: September 12, 2002

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

In The Claims:

1. (**Amended One Time**) A method for processing an input speech signal during presentation of an output audio signal, the method comprising steps of:

detecting a start of the input speech signal;

determining, relative to the output audio signal, an input start time of the start of the input speech signal; and

providing the input start time to establish a context [for use] in responding to the input speech signal.

4. (**Amended One Time**) A method for processing an input speech signal during presentation of an output audio signal, the method comprising steps of:

detecting the input speech signal;

determining an identification corresponding to the output audio signal; and

providing the identification to establish a context [for use] in responding to the input speech signal.

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